

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re: ACANDS, INC., Debtor.	Case No. 02-12687 (KG) Chapter 11 Re: Docket No. 3858
In re: ARMSTRONG WORLD INDUSTRIES, INC., <i>et al.</i> , Debtors.	Case No. 00-04471 (KG) Chapter 11 Jointly Administered Re: Docket No. 10925
In re: COMBUSTION ENGINEERING, INC., Debtor.	Case No. 03-10495 (KG) Chapter 11 Re: Docket No. 3611
In re: THE FLINTKOTE COMPANY, <i>et al.</i> , Debtors.	Case No. 04-11300 (KG) Chapter 11 Jointly Administered Re: Docket No. 9448
In re: KAISER ALUMINUM CORPORATION, <i>et al.</i> , Debtors.	Case No. 02-10429 (KG) Chapter 11 Jointly Administered Re: Docket No. 10462

In re: OWENS CORNING, <i>et al.</i> , Debtors.	Case No. 00-03837 (KG) Chapter 11 Jointly Administered Re: Docket No. 21222
In re: UNITED STATES MINERAL PRODUCTS COMPANY, Debtor.	Case No. 01-02471 (KG) Chapter 11 Re: Docket No. 4206
In re: USG CORPORATION, <i>et al.</i> , Debtors.	Case No. 01-02094 (KG) Chapter 11 Jointly Administered Re: Docket No. 12821
In re: W.R. GRACE & CO., <i>et al.</i> , Debtors.	Case No. 01-01139 (KG) Chapter 11 Jointly Administered Re: Docket No. 32802

**JOINT LIMITED RESPONSE OF FORD MOTOR COMPANY AND HONEYWELL
INTERNATIONAL INC. TO JOINT MOTION OF THE NARCO TAC AND THE FCRS
TO RECONSIDER, OR VACATE, CORRECTING ORDER**

Ford Motor Company (“Ford”) and Honeywell International Inc. (“Honeywell”), by and through their undersigned counsel, hereby file this joint limited response to the *Motion to Reconsider, or Vacate, Correcting Order* (“Motion to Reconsider”) filed by the NARCO TAC and the FCRs (each as defined in the Motion to Reconsider) on December 15, 2016, and in support thereof respectfully state as follows:

Before the Court *sua sponte* issued its correcting order on December 1, 2016 (the “Correcting Order”), the U.S. District Court for the District of Delaware obtained exclusive appellate jurisdiction over the Court’s order dated November 8, 2016 (the “Original Order”) as a result of the timely notices of appeal of both Ford and Honeywell that were filed on November 22, 2016. No other motions related to the Original Order were filed by any party. Therefore, the Notice of Appeal divested this Court of jurisdiction “over those aspects of the case involved in the appeal.” *Griggs v. Provident Consumer Disc. Co.*, 459 U.S. 56, 58 (1982); *see also In re Whispering Pines Estates, Inc.*, 369 B.R. 752, 757 (B.A.P. 1st Cir. 2007).

To the extent the Court determines it has jurisdiction to vacate the Correcting Order, notwithstanding that the Correcting Order pertains to the same issues that are subject to exclusive appellate jurisdiction in connection with the appeals of the Original Order, and without waiving any of Ford’s or Honeywell’s rights, claims, and arguments with respect to either the Original Order or the Correcting Order (which both Ford and Honeywell have also appealed), Ford and Honeywell do not necessarily object to the vacating of the Correcting Order by a court of competent jurisdiction to do so. However, Ford and Honeywell do object to this Court providing any other relief or making any other modifications in regard to either the Original Order or the Correcting Order.

Dated: January 13, 2017
Wilmington, Delaware

Respectfully submitted,

/s/ Justin K. Edelson

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